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8                   **UNITED STATES DISTRICT COURT**  
9                   **NORTHERN DISTRICT OF CALIFORNIA**  
10                  **SAN FRANCISCO DIVISION**  
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12 IN RE: UBER TECHNOLOGIES, INC.,  
13 PASSENGER SEXUAL ASSAULT  
14 LITIGATION

Case No. 3:23-md-03084-CRB

15 This Document Relates to:  
16

17 *Jaylynn Dean v. Uber Technologies, Inc.,*  
18 *et al.*, No. 3:23-cv-06708

**DECLARATION OF SARAH R. LONDON IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO EXTEND  
DEADLINE TO OPPOSE UBER'S MOTION  
FOR (1) POSTPONEMENT OF FIRST  
BELLWETHER TRIAL AND RELATED  
RELIEF, AND (2) THIRD-PARTY SUBPOENA  
REGARDING MISLEADING AD CAMPAIGN**

19                  Judge:         Hon. Charles R. Breyer  
20                  Courtroom:    6 – 17 Floor  
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1 I, Sarah R. London, declare:

2       1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and  
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of  
4 the State Bar of California and am admitted to practice before this Court. I make this declaration  
5 based on my own personal knowledge. If called upon to testify, I could and would testify  
6 competently to the truth of the matters stated herein.

7       2. On December 2, Uber filed a Motion for (1) Postponement of First Bellwether Trial  
8 and Related Relief, and (2) Third-Party Subpoena Regarding Misleading Ad Campaign (ECF No.  
9 4498) (the “Motion”).

10      3. The Motion seeks, among other things, to effect a prior restraint on an advocacy  
11 group’s publication of a political advertising campaign, referred to as the Every 8 Minutes  
12 campaign, and discovery concerning that advocacy group’s internal speech concerning the  
13 campaign.

14      4. Uber notes that the Every 8 Minutes campaign was paid for by Consumer Attorneys  
15 of California Initiative Defense Political Action Committee, which is not affiliated with any  
16 bellwether Plaintiff.

17      5. No one on MDL Leadership sits on the Consumer Attorneys Political Action  
18 Committee Board of Trustees, the body that approved, directed, and runs the Every 8 Minutes  
19 campaign.

20      6. CAOC was not served with the Motion. I am informed that CAOC only recently  
21 retained counsel and is evaluating whether and how to respond to the Motion.

22      7. On December 15, my colleague and I contacted Uber’s counsel to request that Uber  
23 stipulate to an extension of the deadline to oppose the Motion. We have not received a response  
24 from Uber’s counsel as of the time of this filing.

25      8. The Court has extended other deadlines in this MDL but none relate to this Motion.

26      9. Plaintiffs do not seek extension of the hearing date for the Motion or any other  
27 deadlines related to the trial in Ms. Dean’s case.

28      I declare under penalty of perjury that the foregoing is true and correct.

1 Executed this 15th day of December, 2025 in Muskogee, Oklahoma  
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3 /s/ Sarah R. London

4 Sarah R. London

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6 **FILER'S ATTESTATION**

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8 I, Andrew Kaufman, am the ECF User whose ID and password are being used to file this  
9 document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the  
10 signatories identified above has concurred in this filing.

11 Dated: December 15, 2025

12 /s/ Andrew Kaufman

13 Andrew Kaufman